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The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

BY ECF AND HAND DELIVERY – CORRECTED VERSION

Re: *In re Terrorist Attacks on September 11, 2001*, No. 1:03-md-01570-GBD-FM

Dear Judge Maas:

We write on behalf of defendant Dallah Avco to update the information in our April 22, 2015, letter regarding the status of Dallah Avco's document production. Over the past month, Dallah Avco has made extraordinary efforts to complete its document review. Dallah Avco now has approximately 20 people working across two shifts from 10 a.m. to 10 p.m. each workday to complete review of the documents described in our April 22 letter. As a result, Dallah Avco now expects to complete its production in response to plaintiffs' jurisdictional discovery demands ahead of the schedule in our earlier letter – more specifically, by around the end of this month.

The current status of each item in our earlier letter is as follows:

- The vendor finished scanning the 400,000 pages of ANSS project employee files retrieved from the first Dallah City search. English OCR results have been collected. Dallah Avco does not believe there are any additional responsive documents among them, but is double-checking and will produce any this week. Dallah Avco expects to produce Arabic OCR results, if any, in approximately two weeks.
- The second Dallah City search has now been completed, yielding approximately 442 additional boxes of ANSS files, each with about 2,000 to 10,000 pages of documents. 127 boxes – containing around 700,000 pages – have been manually reviewed so far, yielding 22 pages of responsive documents, which were produced to plaintiffs yesterday. Many of the remaining boxes are believed to be outside the relevant date range. Dallah Avco expects to complete review of the boxes by May 28.
- The additional Dallah Tower ANSS financial files were found to comprise about 65 boxes, 25 of them duplicates, each containing about 2,000 to 10,000 pages. Review of those boxes has been completed.

Respectfully submitted,

Robert Kry

cc: All counsel by ECF